

1 RENE L. VALLADARES  
Federal Public Defender  
2 State Bar No. 11479  
3 JOANNE L. DIAMOND  
Assistant Federal Public Defender  
4 411 E. Bonneville, Ste. 250  
Las Vegas, Nevada 89101  
5 (702) 388-6577  
Joanne\_Diamond@fd.org

6 Attorney for to Joshua Martinez  
7

8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,  
11  
12 Plaintiff,  
13 v.  
14 JOSHUA MARTINEZ,  
15 Defendant.

Case No. 2:21-cr-00219-APG-DJA

**Stipulation to Continue  
Sentencing Hearing  
(First Request)**

16  
17 IT IS HEREBY STIPULATED AND AGREED, by and between Jason M.  
18 Frierson, United States Attorney, and Daniel R. Schiess, Assistant United States  
19 Attorney, counsel for the United States of America, and Rene L. Valladares,  
20 Federal Public Defender, and Joanne L. Diamond, Assistant Federal Public  
21 Defender, counsel for Joshua Martinez, that the Sentencing Hearing currently  
22 scheduled on November 28, 2023, be vacated and continued to a date and time  
23 convenient to the Court, but no sooner than ninety (90) days.

24 This Stipulation is entered into for the following reasons:  
25  
26

1           1.       Counsel for the defendant needs additional time to gather mitigation  
2 information for Mr. Martinez, which is relevant to the sentencing disposition of  
3 this case.

4           2.       The defendant is not in custody and agrees with the need for the  
5 continuance.

6           3.       The parties agree to the continuance.

7           This is the first request for a continuance of the sentencing hearing.

8           DATED: November 7, 2023.

9  
10          RENE L. VALLADARES  
11          Federal Public Defender

            JASON M. FRIERSON  
            United States Attorney

12  
13          By /s/ Joanne L. Diamond  
14          JOANNE L. DIAMOND  
15          Assistant Federal Public Defender

            By /s/ Daniel R. Schiess  
            DANIEL R. SCHIESS  
            Assistant United States Attorney

1 UNITED STATES DISTRICT COURT  
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,  
4  
5 Plaintiff,

6 v.

7 JOSHUA MARTINEZ,  
8 Defendant.

Case No. 2:21-cr-00219-APG-DJA  
**ORDER**

9  
10 IT IS THEREFORE ORDERED that the sentencing hearing currently  
11 scheduled for Tuesday, November 28, 2023 at 1:30 p.m., be vacated and continued  
12 to \_\_\_\_\_ at the hour of \_\_:\_\_ .m.; or to a time and date convenient  
13 to the court.

14 DATED this \_\_\_\_ day of November, 2023.

15  
16  
17 \_\_\_\_\_  
18 UNITED STATES DISTRICT JUDGE  
19  
20  
21  
22  
23  
24  
25  
26